



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JRS/GK/DAS  
F. #2021R00900

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 12, 2023

By FedEx

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*Counsel for Ozy Media, Inc.*

*Counsel for Carlos Watson*

Re: United States v. Carlos Watson and Ozy Media, Inc.  
Criminal Docket No. 23-82 (EK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes on the enclosed CD a production of discovery in the above-captioned case. A password to the production will be provided by email.

Enclosed please find the following:

- Three .gpg files from Apple, Inc. relating to the iCloud account “carlos@ozy.com,” and a password file, in a folder bearing Bates number USAO-EDNYOZY000000170;
- Three .gpg files from Apple, Inc. relating to the iCloud account [REDACTED]<sup>1</sup> and a password file, in a folder bearing Bates number USAO-EDNYOZY000000171;
- One .gpg file from Apple, Inc. relating to a device with IMEI 356122175388661, and a password file, in a folder bearing Bates number USAO-EDNYOZY000000172;

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<sup>1</sup> To protect the defendant Carlos Watson’s privacy, this email address will be redacted from the version of this letter filed on the Court’s public docket.

- One .gpg file from Apple, Inc. relating to a device with IMEI 356425102069316, and a password file, in a folder bearing Bates number USAO-EDNYOZY000000173;
- One .gpg file from Apple, Inc. relating to a device with IMEI 356795454745352, and a password file, in a folder bearing Bates number USAO-EDNYOZY000000174; and
- An unredacted search warrant authorizing a search of devices seized from the defendant Carlos Watson, and the unredacted underlying application, Bates-numbered USAO-EDNYOZY000000175 to USAO-EDNYOZY000000240.

This discovery is being provided to you pursuant to the protective order entered by the Court on April 21, 2023, which was later signed by Mr. Sullivan on May 24, 2023. See ECF Dkt. No. 54.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at \*7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at \*22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/  
Jonathan Siegel  
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Assistant U.S. Attorney  
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Enclosure

cc: Clerk of the Court (EK) (by ECF) (without enclosure and with redactions)